



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

8ENF-AT

JAN 19 2017

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glen Jasek, Vice President and General Manager
Williams Four Corners, LLC
1755 Arroyo Drive
Bloomfield, New Mexico 87413

Re: Section 114(a) Request for Information for the Williams Four Corners, LLC, Ignacio Gas Plant located in La Plata County, Colorado

Dear Mr. Jasek:

The Environmental Protection Agency has evaluated the Leak Detection and Repair (LDAR) database provided by Williams Four Corners, LLC (Williams) on February 2, 2016, for the Ignacio Gas Plant. Pursuant to the authority under section 114 of the Clean Air Act (CAA), the EPA is seeking information so that a determination can be made as to whether Williams has been, and is, complying with the applicable LDAR requirements at the Ignacio Gas Plant. Additionally, pursuant to the authority under section 114 of the CAA, the EPA is seeking information so that a determination can be made as to whether Williams has been, and is, complying with applicable requirements pertaining to the flare at the Ignacio Gas Plant.

Pursuant to section 114(a) of the CAA, 42 U.S.C. § 7414(a), the Administrator of the EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records, make reports, sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe) and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the CAA. This authority has been delegated to the undersigned official. In order for the EPA to evaluate Williams' compliance with the CAA, you are hereby required, pursuant to section 114(a) of the CAA, to provide responses to the following Request for Information regarding the Ignacio Gas Plant. Accordingly, within thirty (30) calendar days from receipt of this Request for Information, you must provide responses to the requests in Enclosure 2. See the Instructions and Definitions in Enclosure 1 and the Information Requested in Enclosure 2.

You are required to attach a properly executed Statement of Certification (Enclosure 3) to your response to this Request for Information. Enclosure 3 must be signed and dated by an individual who is authorized by Williams to respond to Requests for Information. You are under an obligation to preserve all documents requested in this letter until you receive further instructions from the EPA.

Failure to provide the required information is a violation of the CAA and may result in one or more of the following actions: 1) issuance of an administrative penalty order pursuant to section 113(d) of the CAA, 42 U.S.C. § 7413(d); 2) issuance of an order requiring compliance with this Request for Information; 3) the initiation of a civil action pursuant to section 113(b) of the CAA, 42 U.S.C. § 7413(b); and/or 4) any other action authorized under the CAA. In addition, knowingly providing false information in response to this Request for Information may be actionable under section 113(c) of the CAA, 42 U.S.C. § 7413(c), and 18 U.S.C. §§ 1001 and 1341. The information you provide may be used by the EPA in administrative, civil, and criminal proceedings.

Under section 114(c) of the CAA, 42 U.S.C. § 7414(c), and pursuant to regulations at 40 C.F.R. Part 2, including 40 C.F.R. § 2.301, you are entitled to claim as confidential any information you provide to the EPA which involves trade secrets and is regarded as confidential business information by you. For such information, you may request that the EPA treat such information as confidential. Any such claim for confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). *Note that emissions information is not considered confidential under section 114(c).* For detailed instructions, please see Enclosure 4 to this letter. Information you supply will be treated as confidential business information to the degree determined to be appropriate according to the regulations. If you fail to furnish a business confidentiality claim with your response to this Request for Information, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assist in its review and analysis of the submitted information, the EPA may wish to share all or part of Williams' response with an EPA contractor named Eastern Research Group (ERG). Pursuant to 40 C.F.R. § 2.301(h), the EPA possesses the authority to disclose to any authorized representative of the United States information which might otherwise be entitled to confidential treatment. ERG is providing support to the EPA in LDAR technical matters under contract number EP-W-15-006. This letter serves as notice to Williams' pursuant to 40 C.F.R. § 2.301(h)(2)(iii), of this disclosure. To the extent that Williams' may claim information provided in its response as confidential business information and has comments on this disclosure to ERG, Williams' may submit comments on this disclosure to the EPA with its response to Request 1 of this Request for Information.

YOU MUST SUBMIT ALL RESPONSIVE INFORMATION: *Whether or not you make a claim of confidentiality.*

Please submit your response to this Request for Information to:

U.S. Environmental Protection Agency, Region 8
Technical Enforcement Program (8ENF-AT)
Office of Enforcement, Compliance and Environmental Justice
1595 Wynkoop Street
Denver, Colorado 80202-1129
Attention: Laurie Ostrand

If you have any questions regarding this Request for Information, please contact Laurie Ostrand at (303) 312-6437, or your counsel may contact David Rochlin, at (303) 312-6892.

Sincerely,

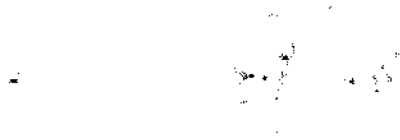
A handwritten signature in black ink, appearing to read 'Suzanne V. Bohan', with a long horizontal line extending to the right.

Suzanne V. Bohan
Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

Enclosures:

- 1) Instructions and Definitions
- 2) Information Requested
- 3) Statement of Certification
- 4) Confidential Business Information
- 5) Gas Plant Microsoft Excel Workbook Files

cc: Gary L. Keele, II, Hall, Estill, Hardwick, Gable, Golden & Nelson, P.C.
Mark Hutson, Southern Ute Indian Tribe



ENCLOSURE 1

A. GENERAL INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question set forth in the Request for Information. If Williams has no responsive information or **documents** pertaining to a particular request, submit an affirmative statement and explanation.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer **identify** the person(s) who provided information that was used or considered in responding to that question, as well as each person who was consulted in the preparation of that response.
3. Indicate on each **document** produced in response to this Request for Information, or in some other reasonable manner, the number of the question to which it corresponds. If a **document** is responsive to more than one request, this must be so indicated and only one copy of the **document** needs to be provided.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where **documents** or other information necessary for a response are neither in your possession nor available to you, indicate in your response why such **documents** or other information are not available or in your possession and identify any source that either possesses or is likely to possess such **documents** or other information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify the **EPA** as soon as possible.

B. INSTRUCTION FOR ELECTRONIC SUBMISSIONS

To aid in our electronic recordkeeping efforts, we request that you provide all **documents** responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive **documents** in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the **document** to be searchable. Submitters providing secured PDFs should also provide unsecured versions for the **EPA** use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel Lotus format, and not in image format. If the Excel format is not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel.
3. Provide submission on physical media such as compact disk, flash drive or other similar item.

4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Enclosure 4 for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

C. INSTRUCTIONS PERTAINING TO THE EPA'S REVIEW OF THE LDAR DATABASE

Based on the information contained in the **LDAR** database(s), the **EPA** has compiled a Microsoft Excel workbook of the instances of possible noncompliance. An electronic copy of the Microsoft Excel workbook is enclosed with this section 114 Request for Information as Enclosure 5. The workbook contains worksheet Tabs corresponding to specific questions in Enclosure 2 of this Request for Information.

Generally, in this Request for Information, the **EPA** requests that Williams provide information that demonstrates compliance was achieved with applicable **LDAR** standards. For each instance of potential noncompliance identified in Enclosure 5, the **EPA** requests that Williams annotate the Excel workbook, describing, if applicable, how Williams achieved compliance in the listed instance, and include any supporting documentation that demonstrates compliance was achieved.

Specifically, the **EPA** requests that Williams annotate the columns titled "Response" and "Documentation Reference" for each instance of potential noncompliance identified in Enclosure 5. Requested annotations to the "Response" columns are listed under each question in Enclosure 2. Under the "Documentation Reference" column, provide a reference to the supporting information submitted (e.g., "LDAR program records located at Ignacio GP\Documentation\Tab2\ComponentID-12851"). If all supporting information was provided in the **LDAR** database files submitted to the **EPA** in February 2016, state which specific tables within the database contain the supporting information. The **EPA** requests that supporting documentation be provided in separate files in Portable Document Format (*.pdf) format, unless otherwise specified in Enclosure 2. Further guidance on information requested by the **EPA** is provided under each question in Enclosure 2.

Regulatory references throughout Enclosure 2 include regulatory provisions that may apply. Where regulatory citations are provided, citations are to the provisions cross-referenced in the applicable standards (for instance, citations are to **Subpart VV** as the applicable standard referenced in **Subpart KKK**).

D. DEFINITIONS

All terms used in this Request for Information will have their ordinary meaning unless such terms are defined in the CAA, other CAA implementing regulations (e.g. 40 C.F.R. Part 63 Subpart HH and 40 C.F.R. Part 60 Subparts VV, VVa, KKK, OOOO, or Subpart OOOOa), or otherwise defined herein.

1. The term “**Act**” or “**CAA**” shall mean the Clean Air Act, 42 U.S.C. §§ 7401 et seq.
2. The term “**affected facility**” shall mean, with reference to a stationary source, any apparatus to which a standard is applicable under the new source performance standards (NSPS) including, for example, **Subparts KKK, NNN, RRR, OOOO, or OOOOa**. With respect to **Subparts KKK, OOOO, and OOOOa**, “**affected facility**” also means the group of all **equipment** except compressors within a **process unit**.
3. The term “**ancillary equipment**” means any of the following pieces of equipment: pumps, pressure relief devices, sampling connection systems, open-ended valves, or lines, valves, flanges, or other connectors.
4. The term “**delay of repair**” shall mean use of provisions under §§ 60.482-9, 60.482a-9, or 61.242-10 to exempt leaking equipment from the requirement to repair within 15 days of identification of a leak.
5. The terms “**document**” and “**documents**” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these, in **Williams’** possession, custody or control or to which **Williams** has or has had access. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
6. The term “**drill and tap repair**” or “**drill and tap repair method**” shall mean a process by which injectable packing or sealant material is injected through an adapter into the stuffing box of a valve. The injectable packing/sealant can replace lost packing material and stop a leak. The valve does not need to be disassembled or taken out of service before the procedure is performed. To affix the adapter to the stuffing box of the valve, a hole is drilled into the stuffing box and tapped with threads, and the adapter is screwed into place.
7. The term “**EPA**” shall mean the United States Environmental Protection Agency.
8. The term “**equipment**” shall mean each pump, pressure relief device, open-ended valve or line, valve, compressor, sampling connection system, and flange or other connector that is in **VOC service** or in **wet gas service**.
9. The term “**first attempt at repair**” shall mean to take action for the purpose of stopping or reducing leakage of organic material to the atmosphere using best practices.

10. The term "**flare**" is broadly defined as any open combustion unit (i.e., lacking an enclosed combustion chamber) whose combustion air is provided by uncontrolled ambient air around the flame, and that is used as a control or safety device. A flare may be equipped with a radiant heat shield (with or without a refractory lining), but is not equipped with a flame air control damping system to control the air/fuel mixture. In addition, a flare may also use auxiliary fuel. The combustion flame may be elevated or at ground level.
11. The term "**hazardous air pollutant (HAP)**" shall mean any air pollutant listed in or pursuant to section 112(b) of the CAA.
12. The term "**identify**" means, **with respect to a natural person**, to set forth the person's name and present or last known: employer, business address and business telephone number, job title (including division or group name), and job description and responsibilities.
13. The term "**identify**" means, **with respect to a corporation, limited liability company, partnership, business trust or other association or business entity (including a sole proprietorship)**, to set forth its full name, address, legal form (e.g., corporation, limited liability company, partnership, etc.), organization, if any, and a brief description of its business.
14. The term "**identify**" means, **with respect to a facility or operation**, the name of that facility or operation, its address, and a brief description of the operations.
15. The term "**identify**" means, **with respect to a document**, to provide its customary business description, its date, its number, if any (e.g., invoice or purchase order number), the author and recipient(s), and to describe the substance or the subject matter.
16. The term "**in volatile organic compound (VOC) service**" shall mean that the piece of **equipment** contains or contacts a process fluid that is at least 10 percent VOC by weight. (The provisions of 40 C.F.R. §§ 60.485(d) or 60.485a(d) specify how to determine that a piece of **equipment** is not in VOC service.)
17. The term "**in volatile hazardous air pollutant (VHAP) service**" shall mean that a piece of **equipment** or compressor either contains or contacts a fluid (liquid or gas) which has a total VHAP concentration equal to or greater than 10 percent by weight as determined according to the provisions of 40 C.F.R. § 63.772(a).
18. The term "**in wet gas service**" shall mean that a piece of **equipment** contains or contacts the field gas before the extraction step in the process.
19. The term "**LDAR**" shall mean leak detection and repair.
20. The term "**Method 21**" shall mean the Test Method for Determination of volatile organic compound leaks at Appendix A-7 to 40 C.F.R. Part 60.

21. The term “**NSPS capital expenditure calculations**” shall mean any calculations performed to determine whether there has been an expenditure for a physical or operational change to an existing facility, as provided under **Subparts KKK, OOOO, OOOOa, VV, and VVa**.
22. The term “**pilot gas**” means gas injected at a **flare** tip to maintain a flame.
23. The term “**process unit**” or “**process units**” shall mean equipment assembled for the extraction of natural gas liquids from field gas, the fractionation of the liquids into natural gas products, or other operations associated with the processing of natural gas products. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the products.
24. The term “**purge gas**” or “**sweep gas**” means all gas introduced prior to the **flare** tip to protect against oxygen buildup in the **flare** header and/or to maintain a constant flow of gas through the **flare** and out the tip.
25. The terms “**relate to**” or “**pertain to**” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
26. The term “**replacement cost**” shall mean the capital needed to purchase all the depreciable components in a facility.
27. The term “**Subpart HH**” shall mean the National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities, 40 C.F.R. §§ 63.760 et seq.
28. The term “**Subpart KKK**” shall mean the Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011, 40 C.F.R. §§ 60.630 et seq.
29. The term “**Subpart OOOO**” shall mean the Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for Which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015, 40 C.F.R. §§ 60.5360 et seq.
30. The term “**Subpart OOOOa**” shall mean the Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, 40 C.F.R. §§ 60.5360a et seq.
31. The term “**Subpart V**” shall mean the National Emission Standard for Equipment Leaks (Fugitive Emission Sources), 40 C.F.R. §§ 61.240 et seq.
32. The term “**Subpart VV**” shall mean the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, 40 C.F.R. §§ 60.480 et seq.

33. The term “**Subpart VVa**” shall mean the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, 40 C.F.R. §§ 60.480a et seq.
34. The term “**supplemental gas**” means all gas introduced to raise the heating value of **waste gas**.
35. The term “**vent gas**” means all gases found just prior to the **flare** tip. This gas includes all **waste gas, purge gas, supplemental gas**, nitrogen and hydrogen, but does not include **pilot gas** or steam.
36. The term “**volatile organic compounds (VOC)**” shall mean, for the purposes of **Subparts KKK, OOOO and OOOOa**, any reactive organic compounds as defined in 40 C.F.R. § 60.2 (Definitions).
37. The term “**volatile hazardous air pollutant (VHAP) concentration**” shall mean the fraction by weight of all hazardous air pollutants (HAP) contained in a material as determined in accordance with procedures specified in §63.772(a).
38. The term “**waste gas**” means all gases routed to a **flare** for combustion, excluding **purge gas, supplemental gas, pilot gas**, and steam.
39. The term “**Williams**” shall mean Williams Four Corners, LLC, and its officers, members, managing members, limited partners, general partners, employees, contractors, and agents. When not in boldface, the term shall mean Williams Four Corners, LLC.

ENCLOSURE 2

INFORMATION REQUESTED:

Using the instructions and definitions set forth in Enclosure 1, provide the following information **within thirty (30) calendar days** from receipt of this Request. If any of the information has been previously submitted to the EPA in its entirety, Williams has the option of resubmitting the information or identifying the previous submission and certifying that the previously-submitted information is true, accurate and complete in accordance with Enclosure 3. Terms in boldface are defined in Enclosure 1. If not otherwise specified, provide your response to each question for the five (5) years prior to the date of the Request for Information.

1. Updated **LDAR** database

Provide in editable electronic format, on compact disc or other electronic storage media, a complete updated backup copy (*.bak format) of **all LDAR** records management databases used from 2012 through 2016 for the Williams Ignacio Gas Plant. Include in your response the name and version of the fugitive emissions monitoring database programs submitted in response to this Request 1.

Requests 2 - 10 Pertain to Enclosure 5

2. New **LDAR** Program **Equipment** (Excel workbook Tab 1)

Tab 1 entries are counts of **equipment** that were added to (and/or removed from) **process units** under the **LDAR** program during one or more calendar quarters evaluated.

- 2.1. The **LDAR** database provided by Williams on February 2, 2016 included **LDAR** data through part of January 2016, update Tab 1 in the yellow shaded area with the count of each type of **equipment** added to (and/or removed from) at each **process unit** under the **LDAR** program during each quarter, through the last complete calendar quarter prior to receipt of this Request for Information.
- 2.2. For any **process units** with **equipment** in **VOC service**, in **VHAP service**, or in **wet gas service** which were not included in the **LDAR** database at the time Williams provided a copy of its database(s) to the **EPA** on February 2, 2016, include those **process units** in Tab 1, and provide the count of each type of **equipment** added to (and/or removed from) the **process unit** during each quarter, from January 1, 2012 through the last complete calendar quarter prior to receipt of this Request for Information.
- 2.3. After updating Tab 1 with the latest **LDAR** program information, for each quarter and **process unit** in which **equipment** was added to the **LDAR** program, state, under the Response column, whether the **equipment** added during the quarter was: (1) Existing **equipment** newly added to the **LDAR** program; or (2) Newly installed **equipment** added to the **LDAR** program. For each instance, provide supporting information that documents/demonstrates the following:

- 2.3.1. For existing **equipment** newly added to the **LDAR** program during that quarter:
 - 2.3.1.1. The date the added **equipment** was physically installed in the **process unit** and a count of each type of **equipment** (e.g., valve, pump, connector) installed on that date, and
 - 2.3.1.2. The date the added **equipment** was placed in **VOC service**, placed in **VHAP service**, or placed in **wet gas service** in the **process unit**, and a count of each type of **equipment** (e.g., valve, pump, connector) placed into service on that date.

Note: If the physical installation date or placed in service date are not know, indicate whether the **equipment** had been overlooked and should have been included in the **LDAR** program.

- 2.3.2. For newly installed **equipment** added to the **LDAR** program, calculate the emission rate increase for the **affected facility** showing:
 - 2.3.2.1. The **LDAR** identification number for each piece of **equipment** added and removed;
 - 2.3.2.2. The service type for each piece of **equipment** added and removed;
 - 2.3.2.3. The type and subtype of each piece of **equipment** added and removed;
 - 2.3.2.4. The emission factor used for each piece of **equipment** added and removed, and
 - 2.3.2.5. The emission calculations, provided in an editable Excel Spreadsheet.
- 2.3.3. For newly installed **equipment** added to the **LDAR** program which result in an emission rate increase in an **affected facility**, provide **NSPS capital expenditure calculations** information for that **affected facility** showing:
 - 2.3.3.1. The cost and **LDAR** identification number of each piece of **equipment** added;
 - 2.3.3.2. The replacement cost of the **affected facility** where the **equipment** was added; and
 - 2.3.3.3. The **NSPS capital expenditure calculation**, provided in an editable Excel spreadsheet.

Note: In its March 4, 2016 letter to the **EPA**, Williams provided capital expenditure calculations for MOC changes occurring in 2014 and 2015. The information provided indicates that no **Subpart OOOO** modifications occurred in 2014 for any of the MOCs identified, and that three **Subpart OOOO** modifications occurred in 2015. However, the **EPA** has identified several concerns with respect to the information provided for the 2014 and 2015 capital expenditure calculations:

- (a) The 2014 capital expenditure thresholds are based on the “B” in the capital expenditure equation being equal to 12.5. The “B” in the equation must be equal to 4.5;
- (b) The **process units** in the 2014 calculations are not equivalent to the existing **process unit** designation. The **NSPS capital expenditure calculations** must correspond to the existing **process unit** designations;
- (c) Backup documentation was not provided for the project costs and should be; and
- (d) The MOC changes identified do not appear to be consistent with the **equipment** changes contained in the **LDAR** database and identified in Tab 1. Please explain why there are differences between the **LDAR** database and the information identified in the MOCs.

The EPA is requesting that you re-evaluate the changes that occurred in 2014 and 2015, as well as changes that occurred in 2012 and 2013, according to the instruction in question 2.3.3, above, and addressing the concerns identified in the above Note.

3. **First Attempt At Repair** (Excel workbook Tab 2)

Tab 2 entries are instances in which information could not be identified that indicates a **first attempt at repair** was performed within 5 days of identification of the leak, as required by 40 C.F.R. §§ 60.482a-2 through 60.482a-8, 60.482-11a, or 61.242-2 through 61.242-8. For each entry in Tab 2, provide a justification/response and supporting documentation indicating how compliance with repair attempt requirements was achieved (for example, "Repair attempt performed by XX person using XX repair method within XX days of leak identification").

Note: If after performing the evaluation in Request #2 Williams determines that **Subparts OOOO or OOOOa** did not apply to a **process unit** at the time of the leak identified in Tab 2, please state so when amending Tab 2.

4. **Final Repairs or Placement on Delay of Repair** (Excel workbook Tab 3)

Tab 3 entries are instances in which information could not be identified that indicates final repair was performed within 15 days of identification of the leak, as required by 40 C.F.R. §§ 60.482-2 through 60.482-8, 60.482-2a through 60.482-8a, 60.482-11a, or 61.242-2 through 61.242-8, or that repairs were exempted under applicable **delay of repair** provisions under 40 C.F.R. §§ 60.482-9, 60.482-9a, or 61.242-10. For each entry in Tab 3, provide a justification/response and supporting documentation indicating how compliance with repair requirements was achieved (for example, "Repair performed by XX person on XX date, and re-monitoring performed by XX person within XX days of leak identification").

Note: If after performing the evaluation in Request #2 Williams determines that **Subparts OOOO or OOOOa** did not apply to a **process unit** at the time of the leak identified in Tab 3, please state so when amending Tab 3.

5. **Follow-Up Monitoring for Leaking Valves** (Excel workbook Tab 4)

Tab 4 entries are instances in which information could not be identified that indicates the valve was monitored monthly—after being found leaking above applicable leak definitions—until the **equipment** was shown not to leak for two consecutive months, as required by 40 C.F.R. §§ 60.482-7(c)(2), 60.482-7a(c)(2), or 61.242-7(c)(2). For each entry in Tab 4, provide a justification/response and supporting documentation indicating the date of each monitoring event and the monitoring result until the component was shown not to leak above applicable thresholds for two consecutive months. If the **equipment** could not be monitored during the period, describe the activity which prevented the **equipment** from being monitored, the start and end date of the activity which prevented the **equipment** from being monitored, and state whether the activity or outage was reported on semiannual LDAR reports. Provide supporting documentation for your responses.

Note: If after performing the evaluation in Request #2 Williams determines that **Subparts 0000** or **0000a** did not apply to a **process unit** at the time of the leak identified in Tab 4, please state so when amending Tab 4.

6. Initial Monitoring for Valves Within 30 Days (Excel workbook Tab 5)

Tab 5 entries are instances in which information could not be identified which indicates **equipment** was monitored within 30 days of being placed into service, as required by 40 C.F.R. §§ 60.482-7(a)(1) and 60.482-7a(a)(1), and considering also the EPA's applicability determination Number 1200052¹, dated October 28, 2011 and titled "Request for Clarification of Initial Monitoring Requirement for Pumps and Valves." For each entry in Tab 5, provide a justification/response and supporting documentation indicating the number of days after being placed into service the **equipment** was monitored, and the date of initial monitoring (for example, "28 days, 3/15/2014").

7. Initial Monitoring to Demonstrate Non-Leak Performance for Valves (Excel workbook Tab 6)

Tab 6 entries are instances in which information could not be identified that indicates the valve was monitored monthly—after being placed into service—unless the valve was shown not to leak above applicable thresholds for two consecutive months, as required by 40 C.F.R. §§ 60.482-7(a)(1), 60.482-7a(a)(1), or 61.242-7(a). For each entry in Tab 6, provide a justification/response documenting the date the valve was placed into service, and the date of each monitoring event and the monitoring result until the valve was shown not to leak above applicable thresholds for two consecutive months. Provide supporting information that demonstrates that the monitoring activity was performed as required, considering also the EPA's applicability determination Number 1200052¹, dated October 28, 2011 and titled "Request for Clarification of Initial Monitoring Requirement for Pumps and Valves."

8. Periodic Monitoring for Valves and Pumps (Excel workbook Tab 7)

Tab 7 entries are instances in which information could not be identified that indicates **equipment** was monitored during the appropriate monthly or quarterly period for a **process unit**, as required by 40 C.F.R. §§ 60.482-2, 60.482-7, 60.482-2a, 60.482-7a, 61.242-2, or 61.242-7. Each entry for a quarter and a **process unit** and a certain type of **equipment** shows the number of monitoring events in the quarter vs the number of that type of equipment. For example, the 4th quarter 2011 entry shows that the Storage and Loading **process unit** had 7 pumps and 21 monitoring events. Since pumps are required to be monitored monthly, this tables shows that all pumps were monitored as required. Entries that show less than a 99% for valves and 300% for pumps (highlighted in yellow in Tab 7) indicate that not all of the valves or pumps in the **process unit** were monitored in that quarter as required by the regulations cited above. For each entry in Tab 7 highlighted in yellow, provide a justification/response and supporting documentation indicating how compliance with applicable monitoring requirements was achieved (for example, "Monitoring performed by XX person on XX date with monitoring reading of XX ppm").

¹ EPA's applicability determination Number 1200052 can be found at: <https://cfpub.epa.gov/adi/pdf/adi-nsp-1200052.pdf>

9. **Method 21** (Excel workbook Tab 8)

Tab 8 entries are instances in which monitoring technicians monitored over 500 pieces of **equipment** in a single day, and often in a fraction of a day. Perform an analysis of the monitoring completed by the technician each day, including an evaluation of the duration of monitoring for each piece of **equipment** based on the **equipment's** size, component type/subtype, and location within the **process unit**, which demonstrates the technician complied with **Method 21**, as required.

10. **Difficult or Unsafe to Monitor or Inspect Justification**

Tab 9 entries are instances in which a justification is not provided in the **LDAR** database indicating why a valve or closed vent system has been categorized as difficult or unsafe to monitor or inspect. For each valve or closed vent system component in Tab 9, under the column titled "Reason Description" and highlighted in yellow, provide a justification as to why the valve or closed vent system component has been categorized as difficult or unsafe to monitor or inspect as required by §§ 60.482-10(l)(2), 60.486(f), 60.482-10a(l)(2), 60.486a(f), 61.242-11(l)(2), and 61.246(f).

11. In a letter dated August 25, 2014 Williams self-disclosed to the **EPA** that it may have missed **Subpart HH** applicability for certain **LDAR** equipment at the Ignacio Gas Plant. Please provide a listing of the **equipment** for which **Subpart HH** applicability was missed and include:

- 11.1. The **LDAR** identification number for each piece of **equipment** missed; and
- 11.2. The type and subtype of each piece of **equipment** missed.

12. **Drill and Tap Repairs**

- 12.1. State whether **Williams** has used the **drill and tap repair method** on any valve in steam, hydrocarbon, or other product service at the Williams Ignacio Gas Plant in the 5 years prior to this request.
- 12.2. If you answered "yes" with regard to question 12.1., please provide or **identify** the following:
 - 12.2.1 The date the **drill and tap repair** was performed;
 - 12.2.2 The company, contractor, and individual(s) that performed the **drill and tap repair**;
 - 12.2.3 The type of valve (e.g., gate, ball, plug, etc.) on which the **drill and tap repair method** was performed
 - 12.2.4 The type of product or material service (e.g., steam, hydrocarbon, methane, propane, NGL, condensate, etc.) for the valve where the **drill and tap repair** was performed;
 - 12.2.5 The cost billed for the **drill and tap repair** if performed by a contractor;
 - 12.2.6 Any information provided by the equipment manufacturer stating the **drill and tap repair** had invalidated product warranties for the equipment which received the repair; and
 - 12.2.7 Copies of all maintenance work orders documenting **drill and tap repairs**.
- 12.3. If you answered "no" with regard to question 12.1, please provide or **identify** the following:

- 12.3.1. Copies of all communications with **drill and tap repair** service providers about performing **drill and tap repairs** at the Ignacio Gas Plant;
- 12.3.2. The reason, if a **drill and tap repair** service provider was consulted on a repair, why the **drill and tap repair** was not performed; and
- 12.3.3. The person who made the decision to not to perform the **drill and tap repair**.
- 12.4. Provide any written company policies or guidance created or adopted by Williams, or any of Williams' direct or indirect parent, subsidiary, or sibling companies, regarding use or implementation of the **drill and tap repair method** in the last 5 years, and the date the policy or guidance was created or adopted.
- 12.5. State whether any **Williams** representative consulted on Williams' response to this Request for Information has any knowledge of a **drill and tap repair** performed at a natural gas processing plant that caused and/or was a factor in a safety-related incident at the facility.
- 12.6. If you answered question 12.5. in the affirmative, provide the basis of any knowledge and a detailed explanation of the safety-related incident that resulted from the use of the **drill and tap repair method**. **Identify** the facility where the incident occurred, and then provide the information set forth questions 12.2.1-12.2.4 for the **drill and tap repair**.
13. This request and requests #s 13 - 28, below seek information regarding all devices meeting the definition of **Flare**. List each **Flare** at the Williams Ignacio Gas Plant. For each **Flare**, provide the following:
 - 13.1. **Flare** manufacturer and model;
 - 13.2. **Flare** diameter;
 - 13.3. **Flare** installation date;
 - 13.4. Whether the **Flare** is unassisted, steam-assisted or air-assisted;
 - 13.5. Design destruction efficiency for volatile organic compounds;
 - 13.6. **Flare** design and operation specifications (typically from the manufacturer); and
 - 13.7. Any other written operation and maintenance procedures, including a Startup, Shutdown and Malfunction Plan, if available.
14. Provide a description of gases that are vented to the **Flare(s)**. **Identify** the processes involved. Include approximate frequency (continuous, intermittent, emergency, unit leaks, etc.) and a block flow diagram.
15. For the five years previous to the date of this Request for Information list the periods of time (date, start time, and end time) that **Waste Gas**, **Purge Gas**, and/or **Supplemental Gas** was routed to each **Flare** at the Williams Ignacio Gas Plant (i.e., "venting periods"). Please provide this information in an editable Excel spreadsheet.
16. For each venting period listed in response to request #15 above, provide the average heating value, in BTU/scf, of the **Vent Gas** that was vented to each **Flare**. The averaging time shall not be greater than one hour. If the heating value is not measured, you shall use the best means available to estimate it. Provide a narrative explanation and example calculations describing how you arrived at your response. Please provide this information in an editable Excel spreadsheet.

17. For each venting period listed in response to request #15 above, provide the average mass flow rate of the **Vent Gas**, in lb/hr, that was vented to each **Flare**. The averaging time shall be no more than one hour. If the mass flow rate is not measured, you shall use the best means available to estimate it. Provide a narrative explanation and example calculations describing how you arrived at your response. Please provide this information in an editable Excel spreadsheet.
18. For each venting period listed in response to request #15 above, provide the average rate at which steam and/or air was being added to each **Flare**, in lb/hr for steam and/or scf/hr for air, at all locations on the **Flare** (i.e., the sum of seal, upper, lower, winterizing, etc.) during each venting period. The averaging time shall not be greater than one hour. If the steam and/or air flow is not measured, you shall use the best means available to estimate it. Provide a narrative explanation and example calculations, if appropriate, describing how you arrived at your response. Please provide this information in an editable Excel spreadsheet.
19. For each venting period listed in response to request #15 above, provide the average steam-to-**Vent Gas** or air-to-**Vent Gas** ratio (lb steam/lb **Vent Gas** or scf of air/lb of **Vent Gas**) during any release to each **Flare**. The averaging time shall be no more than one hour. Provide a narrative explanation and example calculations, if appropriate, describing how you arrived at your response. Please provide this information in an editable Excel spreadsheet.
20. Provide a list of the primary constituents in the **Vent Gas** routed to each **Flare** for venting periods since January 1, 2012, the range of each constituent's concentration. If continuous measurements are not available, provide an estimate of the range of each constituent's concentration. Provide any measurements, calculations or test results used to determine the constituent's concentrations. Please provide this information in an editable Excel spreadsheet.
21. For each **Flare**, provide the minimum and maximum steam or air addition rates, in lb/hr for steam and/or scf/hr for air, at all locations on the **Flare** (seal, upper and lower). To the extent that the steam or air addition rates change on a seasonal basis, state the rates for each season and the time periods during which each season's rates apply.
22. Provide copies of any and all **documents** in your possession, custody, or control that prescribe or recommend the amount of steam or air to be added to each **Flare**. Provide a copy of the entire **document** if, within the **document**, it states the maximum steam or air rate, minimum steam or air rate, steam or air addition rate associated with a vent scenario, general steam-to-vent gas or air-to-organic gas/vent gas ratio, or any other reference to steam addition.
23. For each **Flare**, state with specificity which, if any, federal regulations regulate/apply to each **Flare**.
24. For each **Flare**, state whether the **Flare** is configured to receive gases/vapors from one or more pressure relief device(s), which is a safety device used to prevent operating pressures from exceeding the maximum allowable working pressure of the process equipment.
25. For each **Flare**, state whether the **Flare** and its associated closed vent system is used as the method of compliance with any federal regulation, including without limitation, the Standards of Performance for New Stationary Sources found at 40 C.F.R. Part 60, the National Emission Standards for Hazardous Air Pollutants found at 40 C.F.R. Part 61, and the National Emission Standards for Hazardous Air Pollutants for Source Categories found at 40 C.F.R. Part 63.

26. Provide your procedure for controlling steam or air added to the **Flare(s)**, including during process equipment upsets and/or when the flare is smoking. Be sure to address operations that occur at night and other periods of low visibility. Indicate how long this procedure has been in place and, if applicable, provide the previous procedure(s).
27. Describe your efforts to minimize all gas streams routed to the **Flare(s)**. In particular, describe your efforts to recover waste gases from process units that would otherwise be routed to the **Flare** as waste gas.
28. Provide copies of all testing reports or analytical results which **relate to the Waste Gas** routed to each **Flare**.
29. **Identify** any **documents** or portions of **documents** otherwise responsive to this Request for Information that have been withheld on grounds of privilege. For each such **document** or portions of **document**, also provide the request that the **document** is responsive to, and the grounds for the privilege asserted.

ENCLOSURE 3

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

(Signature)

(Printed Name)

(Title)

(Date)

ENCLOSURE 4

Confidential Business Information (CBI) Assertion and Substantiation Requirements

You may assert a business confidentiality claim covering all or part of the information you provide in response to this Request for Information for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (CAA), 42 U.S.C. § 7414, and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the CAA, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." See 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the CAA and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this Request for Information, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time you submit your response to this Request for Information. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; (3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business's competitive position. See 40 C.F.R. § 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this Request for Information the EPA is requesting, in accordance with 40 C.F.R. § 2.204(e)(4), that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment?
Specify by page, paragraph, and sentence when identifying the information subject to your claim.

2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

David Rochlin
U.S. EPA Region 8
1595 Wynkoop Street (ENF-L)
Denver, CO 80202-1129
303-312-6892

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering all or part of your response to the above questions, as provided in 40 C.F.R. § 2.203(b). See 40 C.F.R. § 2.204(e)(6). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the CAA and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.